

EXHIBIT 3

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

This Document Relates to All Actions

**DECLARATION OF JUCAI GE
IN SUPPORT OF ZHP DEFENDANTS' MOTION TO SEAL**

1. My name is Jucai Ge. I have worked for Defendant Zhejiang Huahai Pharmaceutical Co., Ltd. ("ZHP") for approximately 23 years and am presently Executive Vice General Manager of Hubei Saiao Biopharmaceutical Co., Ltd., a subsidiary of ZHP. I am over twenty-one years of age and of sound mind. I am competent to affirm all of the matters set out in this Declaration. Unless otherwise stated, all matters herein are within my personal knowledge.
2. I submit this declaration in support of the motion to seal filed by ZHP, Princeton Pharmaceutical Inc. ("Princeton"), Huahai U.S. Inc. ("Huahai"), and Solco Healthcare U.S., LLC ("Solco") (collectively, the "ZHP Defendants") (the "Motion").
3. The Motion seeks to maintain as confidential certain detailed, technical manufacturing and testing process information appearing on pages 16, 23, 26, 27, 28, 29, 32, 33, 34, 35, 36, 40, and 41 of the Expert Report of Fengtian Xue, Ph.D. ("Dr.

Xue's Report"), which the ZHP Defendants propose redacting ("Redacted Information").

4. I have reviewed the Redacted Information contained in Dr. Xue's Report.
5. The Redacted Information includes highly sensitive and detailed information regarding ZHP's manufacturing of Valsartan active pharmaceutical ingredient ("API"), including information regarding ZHP's *current manufacturing processes* for Valsartan API. The Redacted Information includes information contained in the Drug Master File ("DMF") submitted by ZHP to the United States Food & Drug Administration ("FDA") for Valsartan API, which is closely guarded by ZHP and considered among the most confidential and sensitive information in the company.
6. Public disclosure of the Redacted Information would result in significant commercial harm to ZHP by revealing to its competitors detailed information regarding its manufacturing processes, including its *current manufacturing processes*. Such information includes, but is not limited to: (a) the materials it uses in specific steps, (b) the quantities or amounts of such materials, and perhaps most significantly, (c) the company's rationale for those process decisions.
7. For example, in Table 1a-2 at page 23 of Dr. Xue's Report, Dr. Xue delineates how the company changed a number of specific steps in its manufacturing process and why. Dr. Xue describes that in the esterification step, after changes were made, a different amount of a particular material was used and why the quantity was changed. Dr. Xue describes a similar change in the acylation step. Disclosure of the Redacted Information in this table would reveal confidential manufacturing information that could be exploited commercially by ZHP's competitors.

8. Likewise, in Table 1a-3 on pages 26 and 27 of Dr. Xue's Report, Dr. Xue documents other manufacturing process changes with respect to particular steps, describing the step and the original process as well as the new proposed process and notes on the changes. The Redacted Information in this table (which encompasses only the data in "Proposed Process" and "Note on Changes" columns, not information relating to the original process) would provide competitors with a window not only into ZHP's current processes but also its rationales for process changes, which could easily be exploited by other companies engaged in API manufacturing to improve their own processes at the expense of ZHP.
9. Disclosure of the Redacted Information appearing on pages 16, 28-29, 32-33, and 40-41 of Dr. Xue's Report – all of which also contains detailed technical know-how relating to ZHP's manufacturing processes – would cause significant harm to the company for the same reasons as described above.
10. The Redacted Information on pages 34-36 of Dr. Xue's Report sets forth details regarding ZHP's testing for impurities, including whether the evaluations were affected by the process changes and, if so, how. The disclosure of ZHP's testing processes would likewise enable competitors to unfairly leverage technical knowledge that ZHP has gained through expense and effort.

11. In conclusion, the Redacted Information contained in Dr. Xue's Report is not public,
and its disclosure would cause serious competitive harm to ZHP for the reasons
described herein.

I declare under penalty of perjury under the laws of the United States that to the best of
my knowledge the foregoing is true and correct.

Executed on July 20, 2023 in Hubei (city), Gongyan (state).

Jucai Ge
Jucai Ge, Declarant